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WRITER'S DIRECT DIAL

November 3, 2003

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket 94-102
E911 Quarterly Report
Rural Cellular Corporation for itself and its affiliates

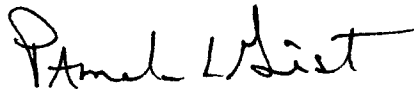
Dear Ms. Dortch:

On behalf of Rural Cellular Corporation and its subsidiaries¹ (collectively, "RCC") there is submitted herewith a report the status of the company's implementation of E911 services.

RCC is a digital wireless carrier operating cellular radiotelephone and/or personal communications services in multiple markets. RCC is a Tier II carrier as defined in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 2002 FCC LEXIS 3638, FCC 02-210 (2002) ("*Phase II Stay Order*"). This report is submitted in compliance with the terms of the *Phase II Stay Order*.

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,



Pamela L. Gist

^{1/} This report pertains to the following companies which are wholly-owned subsidiaries of Rural Cellular Corporation and are authorized by the FCC to provide broadband Commercial Mobile Radio Service: RCC Atlantic, Inc., RCC Holdings, Inc., RCC Minnesota, Inc., Wireless Alliance, LLC and TLA Spectrum, L.L.C.

Rural Cellular Corporation E911 Implementation Report November 3, 2003

Summary

Rural Cellular Corporation ("Rural Cellular") operates wireless networks in rural communities in 14 states covering approximately 5.9 million people. Our service area encompasses 34 rural service areas (RSAs), 3 small metropolitan statistical areas (MSAs) and a few partitioned basic trading areas (BTAs). As of year-end 2002, we had 722,373 customers. The Rural Cellular networks utilize predominately TDMA/analog technology except for 1 MSA that utilizes CDMA and the few partitioned BTAs that utilize GSM.

Phase I

Rural Cellular continues to make progress in its efforts to deploy Phase I location capability services. To date, Rural Cellular has received 132 requests for Phase I service. Of these requests, 103 are in service and 28 are pending. Of the 28 pending requests, 14 are within the 6-month window to deploy, 8 are waiting for facilities from the LEC or waiting for PSAP implementation, and 6 involve a switch share arrangement with another carrier that presents unique call routing issues. For details on these deployments, please refer to the spreadsheet set forth in the Appendix to this report.

Phase II

Rural Cellular also continues to make progress on its Phase II requests. To date, Rural Cellular has received 54 Phase II requests, 7 of which are pending. Of the 7 pending requests, 6 are a result of unique challenges with the switch sharing arrangement and 1 is within the 6-month window for implementation. As expressed in earlier reports to the FCC, Rural Cellular continues to have serious concerns about our ability to achieve FCC compliant accuracy with a network-based Phase II solution in our rural markets. Having completed 54 Phase II deployments with a network-based solution, we now have real data from these deployments which shows that call accuracy is falling short of the FCC mandated requirements.

Network Based Solutions in Rural Areas:

As previously mentioned, Rural Cellular is deploying a network-based solution, provided by Grayson Wireless, which utilizes a complex triangulation method to approximate the location of a 911-wireless caller. Grayson requires the installation of additional equipment, power and data circuits at each cell to gather data from the call. In general, most sites will utilize the Time Difference of Arrival (TDOA) data to determine the handset's location. However, Grayson has recommended large and cumbersome Angle

of Arrival (AOA) antennas at roughly 20% of our sites where there is no third point of reference for the triangulation calculation. These AOA antennas provide the angle of the signal that is transmitted by the handset, providing the critical third reference point. After substantial review of Rural Cellular's cell sites and tower locations, numerous challenges have surfaced in our attempts to deploy these AOA antennas. In most instances, the tower will not support the additional weight of the AOA antennas and the necessary cables to connect to the antennas. In some cases, the installation of AOA antennas would be delayed or blocked by state environmental review or local zoning boards. For example, recently in Vermont, a request to add antennas to an existing structure was delayed for over three years due to local zoning battles. These additional obstacles have resulted in substantial financial and regulatory burdens on Rural Cellular in our attempts to comply with the mandate. Rural Cellular has installed Grayson equipment in the all of the areas where we have Phase 2 requests.

Unlike many carriers serving more metropolitan areas, which have chosen a network-based solution, Rural Cellular's markets do not have the population density to allow the averaging of our rural serving areas (RSAs) with metropolitan serving areas (MSAs) to achieve the mandated accuracy. In light of these circumstances, Rural Cellular is faced with a daunting decision: continue to deploy a network-based solution for Phase 2, knowing that full compliance is not likely to be achieved or migrate to a handset-based solution. The handset-based solution would involve a complete overlay or conversion of our TDMA networks to CDMA/aGPS technology, or possible GSM should a GSM/aGPS handset become available. This network migration would place an enormous financial burden on our organization given the December 2005 deadline for aGPS handset sales and replacement.

With these challenges in mind, Rural Cellular encourages the FCC to consider either relaxed accuracy standards for RSAs and/or extended timelines for TDMA carriers to migrate to networks that support GPS handsets. Despite these challenges, Rural Cellular will continue in our good faith efforts to meet our Phase 2 responsibilities.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reason	Comments
137	Bibb County Communications Center	AL	Bibb	1	TDMA	8/26/00			Y	12/5/02			
142	Butler County Emergency Communications District	AL	Butler	1	TDMA	10/10/00			Y	3/30/03			
143	Calhoun County 9-1-1 District	AL	Calhoun	1	TDMA	9/4/01			Y	11/1/02			
145	Chambers County 9-1-1	AL	Chambers	1	TDMA	7/16/00			Y	10/30/02			
149	Chilton County E9-1-1 Center	AL	Chilton	1	TDMA	12/13/00			Y	1/17/03			
151	Choctaw County 9-1-1 Center	AL	Choctaw	1	TDMA	8/28/99			Y	1/17/03			
155	Clay County E9-1-1	AL	Clay	1	TDMA	7/20/00			Y	1/17/03			
157	Cleburne County 9-1-1 Center	AL	Cleburne	1	TDMA	2/25/00			Y	10/31/02			
175	Elba Police Department	AL	Coffee	1	TDMA	2/2/01			Y	4/10/03			
177	Enterprise Police Department	AL	Coffee	1	TDMA	2/2/01							2 Waiting for PSAP's S-ALI
162	Covington County 9-1-1	AL	Covington	1	TDMA	10/30/00							2 PSAP Equipment upgrade needed
164	Crenshaw County Emergency Center	AL	Crenshaw	1	TDMA	2/2/01			Y	3/20/03			
264	Selma-Dallas Communications Center	AL	Dallas	1	TDMA	11/3/99			Y	12/5/02			
184	Fayette County 9-1-1	AL	Fayette	1	TDMA	11/17/99			Y	5/21/03			
184	Fayette County 9-1-1	AL	Fayette	2	TDMA	11/17/99			Y	11/3/03			
266	Slocumb Police Department	AL	Geneva	1	TDMA	10/17/00			Y	4/10/03			
277	Tuscaloosa Police Department	AL	Green	1	TDMA	9/4/01			Y	1/13/03			
201	Hale County E9-1-1	AL	Hale	1	TDMA	5/11/99			Y	1/17/03			
217	Lamar County 9-1-1	AL	Lamar	1	TDMA	11/15/00			Y	4/30/03			
217	Lamar County 9-1-1	AL	Lamar	2	TDMA	11/15/00			Y	9/2/03			
228	Lowndes County E9-1-1	AL	Lowndes	1	TDMA	1/25/01			Y	1/24/03			
231	Marango County Emergency Communications District	AL	Marango	1	TDMA	8/14/00			Y	1/17/03			
257	Pickens County Sheriffs Office	AL	Pickens	1	TDMA	7/17/00			Y	1/17/03			
275	Troy Police Department	AL	Pike	1	TDMA	5/12/03			Y	7/17/03			
261	Randolph County E9-1-1	AL	Randolph	1	TDMA	3/1/01			Y	1/17/03			
268	Sumter County Sheriffs Office	AL	Sumter	1	TDMA	8/14/00			Y	1/17/03			
271	Talladega Police Department	AL	Talladega	1	TDMA	7/9/99			Y	7/3/03			
226	Lincoln Police Department	AL	Talladega	1	TDMA	7/9/99			Y	7/3/03			
148	Childersburg Police Department	AL	Talladega	1	TDMA	7/9/99			Y	7/3/03			
269	Sylacauga Police Department	AL	Talladega	1	TDMA	7/9/99			Y	7/3/03			
272	Tallapoosa County Sheriffs Office	AL	Tallapoosa	1	TDMA	9/1/99			Y	10/31/02			
127	Alexander City Police Department	AL	Tallapoosa	1	TDMA	9/1/99			Y	10/31/03			
285	Wilcox County E9-1-1 Communications District	AL	Wilcox	1	TDMA	7/19/00			Y	1/17/03			
3179	Massachusetts State Police - Shelburn Falls	MA	Franklin	1	TDMA	10/28/02							Awaiting Circuit installations. Now scheduled for November 13, 2003
3270	Maine State Police RCC-Houlton	ME	Aroostook	1	TDMA	9/24/03							
3251	Cumberland County Communications	ME	Cumberland	1	TDMA	9/24/03							
3253	Franklin County Sheriffs Department	ME	Franklin	1	TDMA	9/24/03							
3258	Kennebec County Sheriffs Department	ME	Kennebec	1	TDMA	9/24/03							
3262	Knox Regional Communications Center	ME	Knox	1	TDMA	9/24/03							
3284	Lincoln County Communications	ME	Lincoln	1	TDMA	12/31/02			Y	7/28/03			
3284	Lincoln County Communications	ME	Lincoln	2	TDMA	9/24/03							
3280	Penobscot County RCC	ME	Penobscot	1	TDMA	9/24/03							
3282	Piscataquis County Sheriffs Department	ME	Piscataquis	1	TDMA	9/24/03							
3291	Somerset County Regional Communications Center	ME	Somerset	1	TDMA	9/24/03							
3296	Waldo County Sheriffs Department	ME	Waldo	1	TDMA	9/24/03							
3304	York County Communications Center	ME	York	1	TDMA	9/24/03							
3596	Aitkin County Sheriffs Office	MN	Aitkin	1	TDMA	2/1/01			Y	4/8/03			
3598	Aitkin County Sheriffs Office	MN	Aitkin	2	TDMA	2/1/01			Y	9/4/03			
3900	Becker County Sheriffs Office	MN	Becker	1	TDMA	2/1/01			Y	3/25/03			
3900	Becker County Sheriffs Office	MN	Becker	2	TDMA	2/1/01			Y	8/28/03			
3901	Beltrami County Law Enforcement Center	MN	Beltrami	1	TDMA	2/1/01			Y	10/27/03			
3901	Beltrami County Law Enforcement Center	MN	Beltrami	2	TDMA	2/1/01			Y	10/27/03			
3902	Benton County Sheriffs Office	MN	Benton	1	TDMA	2/1/01			Y	10/23/03			
3903	Big Stone County Sheriffs Office	MN	Big Stone	1	TDMA	2/1/01			Y	3/28/02			
3903	Big Stone County Sheriffs Office	MN	Big Stone	2	TDMA	2/1/01			Y	7/31/03			
3810	Carlton County Sheriffs Office	MN	Carlton	1	TDMA / GSM	2/1/01			Y	6/4/02			
3810	Carlton County Sheriffs Office	MN	Carlton	2	TDMA / GSM	2/1/01			Y	10/24/03			
3812	Cass County Sheriffs Office	MN	Cass	1	TDMA	2/1/01			Y	3/29/02			
3812	Cass County Sheriffs Office	MN	Cass	2	TDMA	2/1/01			Y	7/24/03			

3815	Clay County Law Enforcement Center	MN	Clay	2	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3816	Clearwater County Sheriffs Office	MN	Clearwater	1	TDMA	2/1/01		Y	1/30/03		
3816	Clearwater County Sheriffs Office	MN	Clearwater	2	TDMA	2/1/01		Y	9/4/03		
3819	Cottonwood County Sheriffs Office	MN	Cottonwood	1	TDMA	2/1/01		Y	4/3/02		
3819	Cottonwood County Sheriffs Office	MN	Cottonwood	2	TDMA	2/1/01		Y	8/7/03		
3820	Crow Wing County Sheriffs Office	MN	Crow Wing	1	TDMA	2/1/01		Y	9/1/03		
3820	Crow Wing County Sheriffs Office	MN	Crow Wing	2	TDMA	2/1/01		Y	10/23/03		
3823	Douglas County Sheriffs Office	MN	Douglas	1	TDMA	2/1/01		Y	7/19/02		
3823	Douglas County Sheriffs Office	MN	Douglas	2	TDMA	2/1/01		Y	8/13/03		
3833	Grant County Sheriffs Office	MN	Grant	1	TDMA	2/1/01		Y	4/19/02		
3833	Grant County Sheriffs Office	MN	Grant	2	TDMA	2/1/01		Y	7/15/03		
3840	Hubbard County Sheriffs Office	MN	Hubbard	1	TDMA	2/1/01		Y	10/27/03		
3840	Hubbard County Sheriffs Office	MN	Hubbard	2	TDMA	2/1/01		Y	10/27/03		
3842	Isanti County Sheriffs Office	MN	Isanti	1	TDMA	2/1/01		Y	3/27/03		
3842	Isanti County Sheriffs Office	MN	Isanti	2	TDMA	2/1/01		Y	10/24/03		
3843	Itasca County Sheriffs Office	MN	Itasca	1	TDMA	2/1/01		Y	3/27/02		
3843	Itasca County Sheriffs Office	MN	Itasca	2	TDMA	2/1/01		Y	6/18/03		
3845	Kanabec County Sheriffs Office	MN	Kanabec	1	TDMA	2/1/01		Y	4/5/02		
3845	Kanabec County Sheriffs Office	MN	Kanabec	2	TDMA	2/1/01		Y	9/4/03		
3847	Kittson County Sheriffs Office	MN	Kittson	1	TDMA	2/1/01		Y	4/3/02		
3847	Kittson County Sheriffs Office	MN	Kittson	2	TDMA	2/1/01		Y	7/24/03		
3848	Koochiching County Sheriffs Office	MN	Koochiching	1	TDMA	2/1/01		Y	4/11/02		
3848	Koochiching County Sheriffs Office	MN	Koochiching	2	TDMA	2/1/01		Y	7/24/03		
3851	Lake of the Woods County Sheriff	MN	Lake of the Woods	1	TDMA	2/1/01		Y	4/12/02		
3851	Lake of the Woods County Sheriff	MN	Lake of the Woods	2	TDMA	2/1/01		Y	8/23/03		
3859	Mahnomen County Sheriffs Office	MN	Mahnomen	1	TDMA	2/1/01		Y	10/27/03		
3859	Mahnomen County Sheriffs Office	MN	Mahnomen	2	TDMA	2/1/01		Y	10/27/03		
3861	Marshall County Sheriffs Office	MN	Marshall	1	TDMA	2/1/01		Y	4/3/02		
3861	Marshall County Sheriffs Office	MN	Marshall	2	TDMA	2/1/01		Y	8/7/03		
3867	Millie Lacs County Sheriffs Office	MN	Millie Lacs	1	TDMA	2/1/01		Y	10/24/03		
3867	Millie Lacs County Sheriffs Office	MN	Millie Lacs	2	TDMA	2/1/01		Y	10/24/03		
3872	Minnesota State Patrol-Brainerd	MN	Crow Wing	1	TDMA	2/1/01		Y	10/23/03		
3872	Minnesota State Patrol-Brainerd	MN	Crow Wing	2	TDMA	2/1/01		Y	10/23/03		
3874	Minnesota State Patrol-Duluth	MN	St. Louis	1	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3881	Minnesota State Patrol-Virginia	MN	St. Louis	1	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3881	Minnesota State Patrol-Virginia	MN	St. Louis	2	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3884	Moorehead Police Department	MN	Clay	1	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3884	Moorehead Police Department	MN	Clay	2	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3885	Morrison County Sheriffs Office	MN	Morrison	1	TDMA	2/1/01		Y	10/23/03		
3885	Morrison County Sheriffs Office	MN	Morrison	2	TDMA	2/1/01		Y	10/23/03		
3891	Norman County Sheriffs Office	MN	Norman	1	TDMA	2/1/01		Y	9/1/03		
3891	Norman County Sheriffs Office	MN	Norman	2	TDMA	2/1/01		Y	9/1/03		
3895	Otter Tail County Sheriffs Office	MN	Otter Tail	1	TDMA	2/1/01		Y	4/12/02		
3895	Otter Tail County Sheriffs Office	MN	Otter Tail	2	TDMA	2/1/01		Y	7/31/03		
3897	Pennington County Sheriffs Office	MN	Pennington	1	TDMA	2/1/01		Y	5/10/02		
3897	Pennington County Sheriffs Office	MN	Pennington	2	TDMA	2/1/01		Y	10/28/03		
3898	Pine County Sheriffs Office	MN	Pine	1	TDMA	2/1/01		Y	4/23/02		
3898	Pine County Sheriffs Office	MN	Pine	2	TDMA	2/1/01		Y	8/28/03		
3700	Polk County Sheriffs Office	MN	Polk	1	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3700	Polk County Sheriffs Office	MN	Polk	2	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3701	Pope County Sheriffs Office	MN	Pope	1	TDMA	2/1/01		Y	11/6/02		
3701	Pope County Sheriffs Office	MN	Pope	2	TDMA	2/1/01		Y	7/24/03		
3704	Red Lake County Sheriffs Office	MN	Red Lake	1	TDMA	2/1/01		Y	5/10/03		
3704	Red Lake County Sheriffs Office	MN	Red Lake	2	TDMA	2/1/01		Y	10/28/03		
3705	Red Lake Indian Reservation Law Enforcement Center	MN	Beltrami	1	TDMA	2/1/01				1/30/04	6 Obtaining addressing for tower location
3711	Roseau County Sheriffs Office	MN	Roseau	1	TDMA	2/1/01		Y	4/4/02		
3711	Roseau County Sheriffs Office	MN	Roseau	2	TDMA	2/1/01		Y	7/24/03		
3713	Sherburne County Sheriffs Office	MN	Sherburne	1	TDMA	2/1/01		Y	10/24/03		
3716	St. Louis County Emergency Communications-Duluth	MN	St. Louis	1	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3716	St. Louis County Emergency Communications-Duluth	MN	St. Louis	2	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3717	St. Louis County Emergency Communications-Virginia	MN	St. Louis	1	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3717	St. Louis County Emergency Communications-Virginia	MN	St. Louis	2	GSM	2/1/01				1/30/04	6 Issues with a switch sharing arrangement
3721	Stearns County Sheriffs Office	MN	Stearns	1	TDMA	2/1/01		Y	10/24/03		
3723	Stevens County Sheriffs Office	MN	Stevens	1	TDMA	2/1/01		Y	11/6/02		
3723	Stevens County Sheriffs Office	MN	Stevens	2	TDMA	2/1/01		Y	7/24/03		
3724	Swift County Sheriffs Office	MN	Swift	1	TDMA	2/1/01		Y	3/27/02		
3724	Swift County Sheriffs Office	MN	Swift	2	TDMA	2/1/01		Y	7/31/03		
3726	Todd County Sheriffs Office	MN	Todd	1	TDMA	2/1/01		Y	3/24/03		
3726	Todd County Sheriffs Office	MN	Todd	2	TDMA	2/1/01		Y	8/7/03		
3727	Traverse County Sheriffs Office	MN	Traverse	1	TDMA	2/1/01		Y	10/27/03		
3727	Traverse County Sheriffs Office	MN	Traverse	2	TDMA	2/1/01		Y	10/27/03		
3730	Wadena County Sheriffs Office	MN	Wadena	1	TDMA	2/1/01		Y	4/3/02		
3730	Wadena County Sheriffs Office	MN	Wadena	2	TDMA	2/1/01		Y	8/7/03		
3737	Wilkin County Law Enforcement Center	MN	Wilkin	1	TDMA	2/1/01		Y	10/27/03		

3737	Wilkin County Law Enforcement Center	MN	Wilken	2	TDMA	2/1/01		Y	10/27/03			
3990	Coahoma County E9-1-1	MS	Coahoma	1	TDMA	12/26/02		Y	9/26/03			
4042	Leflore County Sheriffs Department	MS	Leflore	1	TDMA	10/17/02		Y	9/26/03			
4051	Marshall County E9-1-1	MS	Marshall	1	TDMA	10/23/02		Y	9/23/03			
4066	Panola County Sheriff	MS	Panola	1	TDMA	10/22/02		Y	10/9/03			
4109	Water Valley Police Department	MS	Yalobusha	1	TDMA	4/1/03		Y	9/23/03			
4503	Cass County Sheriff	ND	Cass	1	GSM	8/27/03						
4512	Grand Forks County PSAP	ND	Grand Forks	1	GSM	8/27/03						
4546	Trail County Sheriffs Office	ND	Trail	1	GSM	8/27/03						
4670	New Hampshire Bureau of Emergency Communication	NH	Merrimack/Statewide	1	TDMA/CDMA	2/1/03		Y	10/31/03			
5056	Clinton County Primary Safety Answering Point	NY	Clinton	1	TDMA	4/14/03						1 Trunks ordered, awaiting delivery
5082	Fulton County Sheriffs Office	NY	Fulton	1	TDMA	8/22/03						
5756	Baker County Sheriffs Office	OR	Baker	1	TDMA	Prior to April 2000		Y	4/10/03			
5759	Burns Police Department	OR	Harney	1	TDMA	Prior to April 2000						2
5770	Corvallis Regional Communications Center-Benton Co	OR	Benton	1	TDMA	Prior to April 2000		Y	5/23/02			
5774	Deschutes County 9-1-1	OR	Deschutes	1	TDMA	Prior to April 2000		Y	1/23/03			
5781	Hermiston Police Department	OR	Umatilla	1	TDMA	Prior to April 2000		Y	4/10/03			
5788	Klamath County 9-1-1 Communications	OR	Klamath	1	TDMA	Prior to April 2000		Y	8/29/02			
5791	Lakeview 9-1-1 Communications Center	OR	Lake	1	TDMA	Prior to April 2000						2
5795	Lincoln County Communications Agency	OR	Lincoln	1	TDMA	Prior to April 2000		Y	8/14/02			
5796	Linn County Sheriffs Office	OR	Linn	1	TDMA	Prior to April 2000		Y	5/23/02			
5822	Prineville Police Department	OR	Crook	1	TDMA	Prior to April 2000		Y	4/10/03			
5834	Toledo Police Department	OR	Lincoln	1	TDMA	Prior to April 2000		Y	8/14/02			
5835	Umatilla County Sheriffs Office	OR	Umatilla	1	TDMA	Prior to April 2000		Y	4/10/03			
6167	Minnehaha Metro Communications	SD	Minnehaha	1	GSM	8/19/03						
7233	Hartford Police Department	VT	Windsor	1	TDMA	3/28/00		Y	8/6/02			
7234	Lamoille County Sheriff	VT	Lamoille	1	TDMA	3/28/00		Y	8/6/02			
7234	Lamoille County Sheriff	VT	Lamoille	2	TDMA	1/7/02		Y	5/9/03			
7235	Montpelier City Police	VT	Washington	1	TDMA	3/28/00		Y	8/6/02			
7235	Montpelier City Police	VT	Washington	2	TDMA	1/7/02		Y	5/9/03			
7237	Shelburne Police Department	VT	Chittenden	1	TDMA	3/28/00		Y	8/6/02			
7237	Shelburne Police Department	VT	Chittenden	2	TDMA	1/7/02		Y	5/9/03			
7242	Vermont State Police-Williston	VT	Chittenden	1	TDMA	3/28/00		Y	8/6/02			
7242	Vermont State Police-Williston	VT	Chittenden	2	TDMA	1/7/02		Y	5/9/03			
7238	Springfield Police Department	VT	Windsor	1	TDMA	3/28/00		Y	8/6/02			
7240	Vermont State Police-Rockingham	VT	Windham	1	TDMA	3/28/00		Y	8/6/02			
7240	Vermont State Police-Rockingham	VT	Windham	2	TDMA	1/7/02		Y	5/9/03			
7241	Vermont State Police-Rutland	VT	Rutland	1	TDMA	3/28/00		Y	8/6/02			
7241	Vermont State Police-Rutland	VT	Rutland	2	TDMA	1/7/02		Y	5/9/03			
7244	Asotin County Dispatch Center	WA	Asotin	1	TDMA	12/2/02		Y	6/30/03			
7252	Chelan County Sheriffs Office	WA	Chelan	1	TDMA	12/12/02		Y	9/22/03			
7258	Columbia County Sheriffs Office	WA	Columbia	1	TDMA	11/4/02		Y	6/30/03			
7263	Douglas County Sheriffs Department	WA	Douglas	1	TDMA	10/24/02		Y	9/10/03			
7266	Ferry County E9-1-1	WA	Ferry	1	TDMA	12/2/02		Y	9/19/03			
7278	Garfield County Sheriffs Office	WA	Garfield	1	TDMA	10/25/02		Y	6/30/03			
7324	Okanogan County Sheriffs Office	WA	Okanogan	1	TDMA	10/31/02		Y	6/30/03			
7329	Pend Oreille 9-1-1	WA	Pend Oreille	1	TDMA	11/8/02		Y	6/30/03			
7359	Stevens County Department of Emergency Services	WA	Stevens	1	TDMA	12/10/02		Y	9/9/03			
7373	Walla Walla Emergency Services Communications Ce	WA	Walla Walla	1	TDMA	9/11/02		Y	6/30/03			
7384	Whitcom	WA	Whitman	1	TDMA	4/24/02		Y	6/30/03			

AFFIDAVIT

County of Douglas

:

SS

State of Minnesota

:

I, SCOTT DONLEA, having been first duly sworn, depose and state as follows:

1. I am Vice President – Market Development for Rural Cellular Corporation.
2. I am familiar with the facts contained in the foregoing Quarterly Report of Phase-In of E911 Phase II Compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

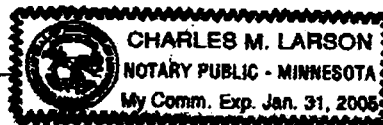
I declare under penalty of perjury that the foregoing is true and correct.

Scott Donlea

Scott Donlea
Vice President – Market Development
Rural Cellular Corporation

Subscribed to and sworn to before me
this 3 day of November 2003.

Charles M. Larson
Notary Public



My commission expires:

CERTIFICATE OF SERVICE

I, Daniel Ladmirault, an employee in the law offices of Lukas, Nace Gutierrez & Sachs, Chartered, do hereby certify that I have on this 3rd day of November, 2003, sent by U.S. Mail, a copy of the foregoing E911 Quarterly Report of Rural Cellular Corporation (for itself and its affiliates) to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, DC 20554

David Solomon, Chief*
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-C485
Washington, D.C. 20554

Blaise Scinto, Acting Chief*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C133
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Jennifer Tomchin, Legal Advisor*
Policy Division
Wireless Telecommunications Bureau
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445 12th Street, S.W., Room 3-C400
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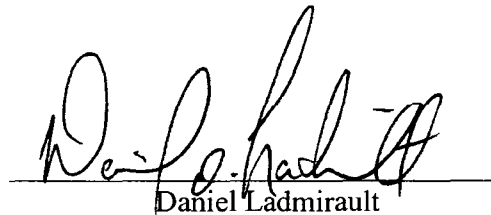
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Vermont Enhanced 9-1-1 Board
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Drawer 20
Montpelier, VT 05620-6501



Daniel Ladmirault

*By Hand-Delivery